

Message

From: Trinh Tran [Trinh.Tran@cabotog.com]
Sent: 9/20/2018 2:09:20 PM
To: Vazquez, Natalia [Vazquez.Natalia@epa.gov]
Subject: FW: Subpart OOOOa annual report
Attachments: RE: NSPS OOOO/OOOOa - Report and Notification Electronic Submission Requirements

Thanks,

Mai-Trinh (Trinh) Tran
Manager, Emissions Compliance

Cabot Oil & Gas Corporation
840 Gessner Road, Suite 1400
Houston, TX 77024-4152

(281)589-4805 office
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From: Trinh Tran
Sent: Wednesday, September 19, 2018 3:47 PM
To: 'isin.amelie@epa.gov' <isin.amelie@epa.gov>
Cc: 'vazquez.natalia@epa.gov' <vazquez.natalia@epa.gov>
Subject: FW: Subpart OOOOa annual report

Natalia,

I was referred to you by Amelie Isin and I hope for guidance from you in regard to the question in my email below.

In short, EPA Region 6 has informed us (members of AXPC, IPAA, API) that for this upcoming annual Subpart OOOOa Certification due October 31, the industry is not required to report via CEDRI as the rule is influx and changes are expected with the forms. Please see attached.

My question is would this also be the case with Region 3? We are working with our IT team to automate the population of the required forms and I would like to delay this effort while the rule is being reconsidered and possible changes to the form may take place.

Thanks,

Mai-Trinh (Trinh) Tran
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From: Trinh Tran

Sent: Tuesday, September 04, 2018 10:42 AM

To: r3wellcompletion@epa.gov; mwejksznepa.gov

Cc: John Smelko <john.smelko@cabotog.com>; Maria Champagne - Cabot Oil & Gas Corporation
<maria.champagne@cabotog.com>

Subject: Subpart OOOOa annual report

Good morning,

EPA Region 6 recently confirmed to members of AXPC tradegroup that for the upcoming Subpart OOOOa annual report due October 31, operators are not required to submit via the CEDRI template for subject sources. Would this be the same case with Region 3?

We are required to submit via CEDRI if the report template has been final and available for 90 days. The annual report form has been available for more than 90 days and we were under the impression that CEDRI template is final; however, recent clarifications from EPA Region 6 and updated language on CEDRI shows that the template is still considered as being in draft form and annual reports using the CEDRI template is voluntary. I would appreciate your response.

Thanks,

Mai-Trinh (Trinh) Tran
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